

IN THE UNITED STATES DISTRICT COURT  
 FOR THE NORTHERN DISTRICT OF TEXAS  
 WICHITA FALLS DIVISION

X CORP., §  
 §  
*Plaintiff,* §  
 §  
 v. § No. 7:24-cv-00114-B  
 §  
 WORLD FEDERATION OF ADVERTISERS; §  
 MARS, INCORPORATED; §  
 CVS HEALTH CORPORATION; §  
 ØRSTED A/S; §  
 NESTLÉ S.A.; NESTLE USA, INC.; §  
 ABBOTT LABORATORIES; §  
 COLGATE-PALMOLIVE COMPANY; §  
 LEGO A/S; LEGO BRAND RETAIL, INC.; §  
 PINTEREST, INC.; §  
 TYSON FOODS, INC.; §  
 SHELL PLC; SHELL USA, INC.; AND §  
 SHELL BRANDS INTERNATIONAL AG, §  
 §  
*Defendants.* §

**APPENDIX SUPPORTING DEFENDANTS' MOTION TO DISMISS  
 FOR FAILURE TO STATE A CLAIM**

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Dated: May 14, 2025

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**CERTIFICATE OF SERVICE**

I hereby certify that on May 14, 2025, I caused the foregoing to be electronically filed with the Clerk of the Court using CM/ECF, which will send notification of such filing to all registered participants.

*/s/ Russ Falconer*

Russ Falconer

## **Exhibit 1**

### **GARM Brand Safety Floor & Suitability Framework**

## CONTEXT FOR THIS SOLUTION

The Global Alliance for Responsible Media (GARM) is an industry first effort that unites marketers, media agencies, media platforms, industry associations, and advertising technology solutions providers to safeguard the potential of digital media by reducing the availability and monetization of harmful content online. These steps are essential to create a safer digital media environment that enriches society through content, communications, and commerce. Harmful content and its creators threaten the potential for digital media and disrupt the connections everyone seeks. Our first step in safeguarding the positive potential for digital is to provide platforms, agencies, and marketers with the framework with which to define safe and harmful content online.

Our position is that you cannot address the challenge of harmful online content if you are unable to describe it using consistent and understandable language.

The GARM has developed and will adopt common definitions to ensure that the advertising industry is categorizing harmful content in the same way across the board. These eleven key categories have been identified in consultation with experts from GARM's NGO Consultative Group. Establishing these standards is the essential foundation needed to stop harmful content from being monetised through advertising. Individual GARM members will adopt these shared principles in their operations, whether they are a marketer, agency, or media platform.

We fundamentally believe that, together, these definitions are the cornerstone for us to find balance between supporting responsible speech, bolstering public safety, and providing for responsible marketing practices. With this framework of consistent categories in place, we will be able to improve transparency in the availability, monetization, and inclusion of content within advertising campaigns. This is essential to help platforms, agencies, and advertisers make decisions essential to the advertising industry.

In November 2019, the GARM initiated work towards this challenge under a working group focused on advancing shared language and standards for advertising & media (as seen in our GARM Charter [here](#)). The output of this work is the following:

1. A common understanding of what harmful and sensitive content is via content categories
2. A common understanding of where ads should not appear, as expressed in a Brand Safety Floor
3. A common way of delineating different risk levels for sensitive content, as expressed in a Brand Suitability Framework

The output of the work is a framework of Shared Definitions that sets the limits for monetization of harmful content in agreed upon categories. This work, the GARM Brand Safety Floor + Suitability Framework was first published in September 2020.

In June 2021, we began work to update the framework to include Misinformation as an additional harmful content category. This important addition builds upon individual GARM member work, GARM member collaboration with regulatory and NGO bodies, and more recently GARM collaboration with the European Commission on the Code of Practice on Misinformation.

## GOALS FOR SOLUTION

This shared framework, which is activated by the IAB TechLab's industry-wide taxonomy, will provide individual GARM participants with:

A Consistent Categorization	Ensuring that there's a common way to categorize sensitive content
Transparency	Creating transparency for industry participants on where sensitive content may be present in the interest of consumer safety and responsible marketing
Clarity in Exceptions	Establishing a method for platforms to report on special exception cases in the interest of responsible speech and public interest

## HOW THIS SOLUTION WILL BE USED

- Platforms will adopt, operationalize and continue to enforce monetization policies with a clear mapping to GARM brand suitability framework

- Platforms will leverage their community standards and monetization policies to uphold the GARM brand safety floor
- Advertising technology providers will adopt and integrate GARM definitions into targeting and reporting services via clear mapping or overt integration
- Agencies will leverage the framework to guide how they invest with platforms at the agency-wide level and at the individual campaign level
- Marketers will use the definitions to set brand risk and suitability standards for corporate, brand and campaign levels

CONTENT CATEGORY	BRAND SAFETY FLOOR – Content not appropriate for any advertising support
Adult & Explicit Sexual Content	<ul style="list-style-type: none"> <li>Illegal sale, distribution, and consumption of child pornography</li> <li>Explicit or gratuitous depiction of sexual acts, and/or display of genitals, real or animated</li> </ul>
Arms & Ammunition	<ul style="list-style-type: none"> <li>Promotion and advocacy of Sales of illegal arms, rifles, and handguns</li> <li>Instructive content on how to obtain, make, distribute, or use illegal arms</li> <li>Glamorization of illegal arms for the purpose of harm to others</li> <li>Use of illegal arms in unregulated environments</li> </ul>
Crime & Harmful acts to individuals and Society, Human Right Violations	<ul style="list-style-type: none"> <li>Graphic promotion, advocacy, and depiction of willful harm and actual unlawful criminal activity—Explicit violations/demeaning offenses of Human Rights (e.g. human trafficking, slavery, selfharm, animal cruelty etc.),</li> <li>Harassment or bullying of individuals and groups</li> </ul>
Death, Injury or Military Conflict	<ul style="list-style-type: none"> <li>Promotion, incitement or advocacy of violence, death or injury</li> <li>Murder or Willful bodily harm to others</li> <li>Graphic depictions of willful harm to others</li> <li>Incendiary content provoking, enticing, or evoking military aggression</li> <li>Live action footage/photos of military actions &amp; genocide or other war crimes</li> <li>Pirating, Copyright infringement, &amp; Counterfeiting</li> </ul>
Online piracy	
Hate speech & acts of aggression	<ul style="list-style-type: none"> <li>Behavior or content that incites hatred, promotes violence, vilifies, or dehumanizes groups or individuals based on race, ethnicity, gender, sexual orientation, gender identity, age, ability, nationality, religion, caste, victims and survivors of violent acts and their kin, immigration status, or serious disease sufferers.</li> </ul>
Obscenity and Profanity, including language, gestures, and explicitly gory, graphic or repulsive content intended to shock and disgust	<ul style="list-style-type: none"> <li>Excessive use of profane language or gestures and other repulsive actions that shock, offend, or insult.</li> </ul>
Illegal Drugs/Tobacco/e-cigarettes/Vaping/Alcohol	<ul style="list-style-type: none"> <li>Promotion or sale of illegal drug use – including abuse of prescription drugs. Federal jurisdiction applies, but allowable where legal local jurisdiction can be effectively managed</li> <li>Promotion and advocacy of Tobacco and e-cigarette (Vaping) &amp; Alcohol use to minors</li> <li>Malware/Phishing</li> </ul>
Spam or Harmful Content	
Terrorism	<ul style="list-style-type: none"> <li>Promotion and advocacy of graphic terrorist activity involving defamation, physical and/or emotional harm of individuals, communities, and society</li> </ul>
Debated Sensitive Social Issue	<ul style="list-style-type: none"> <li>Insensitive, irresponsible and harmful treatment of debated social issues and related acts that demean a particular group or incite greater conflict;</li> </ul>
Misinformation	<ul style="list-style-type: none"> <li>Misinformation is defined as the presence of verifiably false or willfully misleading content that is directly connected to user or societal harm</li> </ul>

**Brand Suitability Framework: Sensitive content appropriate for advertising supported by enhanced advertiser controls**

CONTENT CATEGORY	High Risk	Medium Risk	Low Risk
Adult & Explicit Sexual Content	<ul style="list-style-type: none"> <li>Suggestive sexual situations requiring adult supervision/approval or warnings</li> <li>Full or liberal Nudity</li> </ul>	<ul style="list-style-type: none"> <li>Dramatic depiction of sexual acts or Sexuality issues presented in the context of entertainment</li> <li>Artistic Nudity</li> </ul>	<ul style="list-style-type: none"> <li>Educational, Informative, Scientific treatment of sexual subjects or sexual relationships or sexuality</li> </ul>
Arms & Ammunition	<ul style="list-style-type: none"> <li>Glamorization /Gratuitous depiction of illegal sale or possession of Arms</li> <li>Depictions of sale/use/distribution of illegal arms for inappropriate uses/harmful acts</li> </ul>	<ul style="list-style-type: none"> <li>Dramatic depiction of weapons use presented in the context of entertainment</li> <li>Breaking News or Op-Ed coverage of arms and ammunition</li> </ul>	<ul style="list-style-type: none"> <li>Educational, Informative, Scientific treatment of Arms use, possession or illegal sale</li> <li>News feature stories on the subject</li> </ul>
Crime & Harmful acts to individuals and Society, Human Right Violations	<ul style="list-style-type: none"> <li>Depictions of criminal/harmful acts or violation of human rights</li> </ul>	<ul style="list-style-type: none"> <li>Dramatic depiction of criminal activity or human rights violations presented in the context of entertainment</li> <li>Breaking News or Op-Ed coverage of criminal activity or human rights violations</li> </ul>	<ul style="list-style-type: none"> <li>Educational, Informative, Scientific treatment of crime or criminal acts or human rights violations</li> <li>News feature stories on the subject</li> </ul>
Death, Injury or Military Conflict	<ul style="list-style-type: none"> <li>Depiction of death or Injury</li> <li>Insensitive and irresponsible treatment of military conflict, genocide, war crimes, or harm resulting in Death or Injury</li> <li>Depictions of military actions that glamorize harmful acts to others or society</li> </ul>	<ul style="list-style-type: none"> <li>Dramatic depiction of death, injury, or military conflict presented in the context of entertainment</li> <li>Breaking News or Op-Ed coverage of death, injury or military conflict</li> </ul>	<ul style="list-style-type: none"> <li>Educational, Informative, Scientific treatment of death or injury, or military conflict</li> <li>News feature stories on the subject</li> </ul>
Online piracy	<ul style="list-style-type: none"> <li>Glamorization /Gratuitous depiction of Online Piracy</li> </ul>	<ul style="list-style-type: none"> <li>Dramatic depiction of Online Piracy presented in the context of entertainment</li> <li>Breaking News or Op-Ed coverage of Online Piracy</li> </ul>	<ul style="list-style-type: none"> <li>Educational, Informative, Scientific treatment of Online Piracy</li> <li>News feature stories on the subject</li> </ul>
Hate speech & acts of aggression	<ul style="list-style-type: none"> <li>Depiction or portrayal of hateful, denigrating, or inciting content focused on race, ethnicity, gender, sexual orientation, gender identity, age, ability, nationality, religion, caste, victims and survivors of violent acts and their kin, immigration status or serious disease sufferers, in a non-educational, informational, or scientific context</li> </ul>	<ul style="list-style-type: none"> <li>Dramatic depiction of hate speech/acts presented in the context of entertainment</li> <li>Breaking News or Op-Ed coverage of hate speech/acts</li> </ul>	<ul style="list-style-type: none"> <li>Educational, Informative, Scientific treatment of Hate Speech</li> <li>News features on the subject</li> </ul>
Obscenity and Profanity, including language, gestures, and explicitly gory, graphic or repulsive content intended to shock and disgust	<ul style="list-style-type: none"> <li>Glamorization /Gratuitous depiction of profanity and obscenity</li> </ul>	<ul style="list-style-type: none"> <li>Dramatic depiction of profanity and obscenities presented in the context of entertainment by genre</li> <li>Breaking News or Op-Ed coverage of profanity and obscenities Genre based use of profanity, gestures, and other actions that may be strong, but might be expected as generally accepted language and behavior</li> </ul>	<ul style="list-style-type: none"> <li>Educational or Informative, treatment of Obscenity or Profanity</li> <li>News feature stories on the subject</li> </ul>
Illegal Drugs/Tobacco/e-cigarettes/Vaping/Alcohol	<ul style="list-style-type: none"> <li>Glamorization /Gratuitous depictions of illegal drugs/abuse of prescription drugs</li> <li>Insensitive and irresponsible content/treatment that encourages minors to use tobacco and vaping products &amp; Alcohol</li> </ul>	<ul style="list-style-type: none"> <li>Dramatic depiction of illegal drug use/prescription abuse, tobacco, vaping or alcohol use presented in the context of entertainment</li> <li>Breaking News or Op-Ed coverage of illegal drug use/prescription abuse, tobacco, vaping or alcohol use</li> </ul>	<ul style="list-style-type: none"> <li>Educational, Informative, Scientific treatment of illegal drug use/prescription abuse, tobacco, vaping or alcohol</li> <li>News feature stories on the subject</li> </ul>
Spam or Harmful Content	<ul style="list-style-type: none"> <li>Glamorization /Gratuitous depiction of Online Piracy</li> </ul>	<ul style="list-style-type: none"> <li>Dramatic depiction of Spam or Malware presented in the context of entertainment</li> <li>Breaking News or Op-Ed coverage of Spam or Malware</li> </ul>	<ul style="list-style-type: none"> <li>Educational, Informative, Scientific treatment of Spam or Malware</li> <li>News feature stories on the subject</li> </ul>

CONTENT CATEGORY	High Risk	Medium Risk	Low Risk
Terrorism	<ul style="list-style-type: none"> <li>Depiction of terrorist actions that are disturbing, agitating or promotes harmful acts to others or society</li> <li>Terrorist content requiring a viewer advisory</li> <li>Insensitive and irresponsible treatment of terrorism/ related crimes</li> </ul>	<ul style="list-style-type: none"> <li>Dramatic depiction of terrorism presented in the context of entertainment</li> <li>Breaking News or Op-Ed coverage of acts of terrorism</li> </ul>	<ul style="list-style-type: none"> <li>Educational, Informative, Scientific treatment of terrorism</li> <li>News feature stories on the subject</li> </ul>
Debated Sensitive Social Issue	<ul style="list-style-type: none"> <li>Depiction or discussion of debated social issues and related acts in negative or partisan context</li> </ul>	<ul style="list-style-type: none"> <li>Dramatic depiction of debated social issues presented in the context of entertainment</li> <li>Breaking News or Op-Ed coverage of partisan advocacy of a position on debated sensitive social issues</li> </ul>	<ul style="list-style-type: none"> <li>Educational, Informative, Scientific treatment of debated sensitive social issues and related acts including misinformation</li> <li>News feature stories on the subject</li> </ul>
<i>Misinformation</i>	<ul style="list-style-type: none"> <li>Glamorization/Gratuitous depiction of misinformation</li> </ul>	<ul style="list-style-type: none"> <li>Dramatic depiction of misinformation presented in the context of entertainment</li> <li>Breaking News or Op-Ed coverage of misinformation</li> </ul>	<ul style="list-style-type: none"> <li>Educational, Informative, Scientific treatment of misinformation.</li> <li>News features describing various misinformation campaigns as such</li> </ul>

## **Exhibit 2**

### **GARM Charter**



## OUR WORKING CHARTER: PRIORITIES FOR UNCOMMON COLLABORATION

*This document is our cross-industry industry alliance's working charter. It represents our current and shared agreements on where we will focus our multilateral work, and as such the GARM reserves the right to update the document to reflect changes in priorities. This document is correct and approved as of 17 January 2020.*

The rapid growth of digital communications and commerce has connected the world in unprecedented ways. Many of these connections come from advertising-supported platforms which provide immense utility to the billions of people who use them. But as the size of the audiences, and the volume of advertising and commerce on these platforms has grown, in turn, bad actors have been attracted to the environments.

These individuals or groups act as advocates for harmful behavior online, spreading content glorifying harmful behaviors, and at times actively profiting from it. This dynamic is a threat is too costly for all; people, brands, agencies and media platforms.

Many industries and organizations have robust responsibility and safety programs around how they source, create and distribute products – we must extend this same sensibility into advertising and media given its impact on consumers and society.

**The Global Alliance for Responsible Media (GARM) exists to create a more sustainable and responsible digital environment that protects consumers, the media industry, and society as a result.** The GARM is a first-of-its-kind industry-wide, but advertiser centric community of global brands, media agencies, media owners and platforms, and industry bodies. We are using our uncommon collaboration to ensure that there are more positives from digital communications and commerce, and that we effectively reduce the availability and monetization of harmful content.

**The GARM believes that advertiser-funded media platforms should take the necessary steps to address the availability, acceleration or funding of harmful content and behaviors.** We are committed to

- taking actions which will better protect everyone (children in particular) online; and
- working towards a media environment where hate speech, bullying and disinformation is challenged and
- taking steps to ensure personal data is protected and used responsibly when given

We are committed to removing economic incentive and reducing operational loopholes that are exploited by bad actors.

**Our initial focus is on safety for consumers and brands. The Alliance's members acknowledge their collective power to improve this and are identifying concrete initiatives, creating shared processes and common protocols for protecting people and brands.**

We have spent considerable time immersing ourselves with the challenge: speaking to technologists, researchers, platforms, agencies, and advertisers. The opportunity for the GARM is clear; **we will make it easier for all participants to uphold responsible media operations by creating norms that face into technology development, categorization and monetization of content, and incident measurement. – We believe this will ultimately improve the consumer and brand experience, and thereby reduce societal risk.** We will enable this by our three strategic focus areas:

1. Establishing shared, universal safety standards for advertising & media
2. Improving and creating common brand safety tools across the industry
3. Driving mutual accountability and independent verification and oversight

The efforts of GARM will now seek to enable these three strategic focus areas through the following working solutions that will be prioritized via the GARM's roadmap. This collection of endeavors reflects our current consideration set of where to drive our uncommon collaboration. The GARM will report on how we prioritize and deliver across these areas in our journey together:

### *Establishing shared, universal safety standards for advertising & media*

- **Advance shared language and standards for advertising & media:** Advance the adoption of an industry wide common definition of categories of harmful, non-brand safe and suitable content to improve the effectiveness of consumer and brand safety across platforms, geographies and formats



## OUR WORKING CHARTER: PRIORITIES FOR UNCOMMON COLLABORATION

- **Establish advertiser-facing visible rating systems to improve trust and governance:** Verify that each platform has an easy to access and understand risk framework for advertisers and agencies that works across advertising products, and content
- **Educate operators and stakeholders:** Commit to scaling easy-to-access education programs to ensure that all parties are aware of existing tools and best practices to advance online safety.

*Improving and creating common brand safety tools across the industry*

- **Create accessible controls for monetization:** Ensure that platforms have accessible controls that can quickly and effectively remove harmful content from monetization pools and campaigns based on guidelines.
- **Improve operations to better connect risk settings:** Ensure that consumer and brand safety protection practices keep up with the speed of changing community standards by creating tools that better connect with advertiser and agency risk settings.
- **Make conversations safer:** Ensure that safety tools and processes can address the safety and suitability concerns in comments when and where appropriate.
- **Create new anticipatory tools together:** Support individual platforms and cross-platform collaboration to create anticipatory tools which contain and remove harmful content and bad actors.

*Driving mutual accountability*

- **Advance how impact is measured:** Explore ways to advance the transparency and independent partnership in how industry partners report on their steps to categorize, size and remove harmful content and its creators.
- **Clarify platform safe content policies:** Create transparency in how individual platforms make their content with and monetization decisions and detail their remediation policies to affected parties.

We are confident that these actions will make digital and social media environments safer - for our users, customers and for marketers.

Member organizations follow:

## **Exhibit 3**

### **GARM New Member Application**

World Federation  
of AdvertisersGlobal Alliance for  
Responsible Media**Application Form and  
General Information****NEW MEMBER APPLICATION FORM****STEP 1: ESSENTIAL CRITERIA**

GARM is a cross industry initiative to effectively remove harmful content from ad supported media help improve transparency, control, and consistency in the way that the industry effectively removes harmful content from the advertising industry

Do you meet the requirements to join GARM as an ad-tech/developer member? To participate in GARM you need to:

- Actively participate in working groups that develop said solutions
- Agree to work with industry partners and category peers in a collaborative, non-competitive way
- Actively support GARM's Charter
- Agreement to make commensurate changes to business operations in pursuit of GARM's goals

**STEP 2: APPLICATION**

A completed, signed, application form including all pages.

**STEP 3: PROVIDE BILLING/INVOICING INFORMATION**

Once your application has been received you will be asked for any pre-requisites to issuing the invoice i.e. need for PO number or completion of vendor request forms.

**STEP 4: INVOICE IS RAISED AND ISSUED**

Upon receipt of the invoice you have 60 days within which to make payment. If this is contrary to your internal approval process, please advise immediately.

**STEP 5: ON-BOARDING PROCESS**

Upon completion of steps 2 – 4, you will be contacted by our GARM team to discuss your needs with regard to rolling out the membership within your company.

**COMPANY NAME** (as will appear in our list of members)

**ALTERNATIVE TRADING/INVOICE NAME** (if different)

**COMPANY POSTAL ADDRESS**

**WEB ADDRESS**

**VAT NUMBER (EU ONLY) / COMPANY NUMBER (REST OF WORLD)**

World Federation  
of AdvertisersGlobal Alliance for  
Responsible Media**Application Form and  
General Information****MAIN CONTACT**

(this person will be listed as the main contact for the above organisation)

Title (Ms./Mr./etc.)  [REDACTED]	Last Name  [REDACTED]	First Name  [REDACTED]
JOB TITLE  [REDACTED]		
POSTAL ADDRESS (if different to company address)  [REDACTED]		
TELEPHONE  [REDACTED]	MOBILE  [REDACTED]	FAX  [REDACTED]

**WHY ARE YOU INTERESTED IN JOINING GARM**

We believe GARM can have a real positive impact on the industry and as an SSP we'd like to be part of it and help. In addition to that, as we are working hard at decarbonizing the advertising supply path and would love to partner with GARM to develop the sustainability arm of GARM. Education will be key in this journey, and we think that by working with GARM we can have a large positive impact on the industry.

**CONDITIONS & BENEFITS OF MEMBERSHIP**

- Participation in monthly community calls
  - Keep up to date with GARM wide discussions pertaining to solutions and best practices.
- Access to online resources
  - Key documents (GARM deliverable) and previous community call notes as well as suggested external content.
- Participation in a specific Solutions Developer Working Group (SDWG)
  - This group will meet to discuss implementation and practicality of policies agreed in other working groups.

**THE ANNUAL DUES****FEE:** \$6,000**MEMBERSHIP PERIOD:** 1 August 2022 – 31 January 2023**WFA BANK DETAILS****VAT NUMBER**

World Federation  
of AdvertisersGlobal Alliance for  
Responsible Media**Application Form and  
General Information**

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**COMPETITION LAW COMPLIANCE POLICY****KING & SPALDING**

The purpose of the WFA is to represent the interests of advertisers and to act as a forum for legitimate contacts between members of the advertising industry. It is obviously the policy of the WFA that it will not be used by any company to further any anti-competitive or collusive conduct, or to engage in other activities that could violate any antitrust or competition law, regulation, rule or directives of any country or otherwise impair full and fair competition. The WFA carries out regular checks to make sure that this policy is being strictly adhered to. As a condition of membership, members of the WFA acknowledge that their membership of the WFA is subject to the competition law rules and they agree to comply fully with those laws. Members agree that they will not use the WFA, directly or indirectly, (a) to reach or attempt to reach agreements or understandings with one or more of their competitors, (b) to obtain or attempt to obtain, or exchange or attempt to exchange, confidential or proprietary information regarding any other company other than in the context of a bona fide business or (c) to further any anti-competitive or collusive conduct, or to engage in other activities that could violate any antitrust or competition law, regulation, rule or directives of any country or otherwise impair full and fair competition.

**NAME:****DATE:****SIGNED:****KEY CONTACTS WITHIN YOUR ORGANISATION**

Please specify your two key contacts for the developer working group and a list of names for participation in the monthly community calls.

	NAME + EMAIL
<b>EXECUTIVE SPONSOR</b>	[REDACTED]
<b>SOLUTIONS DEVELOPER WORKING GROUP (SDWG)</b>	[REDACTED]
<b>COMMUNITY CALLS</b>	[REDACTED]

**ARE YOU A MEMBER OF ANY OTHER BRAND SAFETY INITIATIVES?**



World Federation  
of Advertisers



Global Alliance for  
Responsible Media

## Application Form and General Information

If yes, please highlight: We are working with Human and Ad Verif.ai

## **Exhibit 4**

### **GARM: Frequently Asked Questions**

WFA

# World Federation of Advertisers

WFA

- [Agencies & Partners](#)
- [Content & Innovation](#)
- [Media Governance & Guardianship](#)
- [Data & Insight](#)
- [Industry issues](#)
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- [Better Marketing Pod with David Wheldon](#)
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  - [Working groups](#)
  - [Industry vacancies](#)
- [Leadership](#)
  - [WFA's 70 in 70](#)
  - [Global Marketer Of The Year](#)
  - [Planet Pledge](#)
  - [GARM](#)
  - [Global Media Charter 2023](#)
  - [Cross-Media Measurement](#)
  - [Data Ethics](#)
  - [WFA President's Awards](#)
- [Tools](#)
  - [Outlook 2024](#)
  - [Advertising Expenditure Forecast](#)
  - [Digital Media Benchmark](#)
  - [Global Privacy Map](#)
  - [Alcohol Advertising Heatmap and Regulatory Mapping](#)
  - [More WFA tools](#)
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## Frequently Asked Questions

### GARM: Frequently Asked Questions

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#### What is GARM?

GARM is the Global Alliance for Responsible Media, a cross-industry initiative that unites advertisers, media agencies, media platforms and industry groups to confront the threat of harmful content online.

The goal is to remove harmful content from advertiser-supported media on digital media platforms, and ensure that the industry works together to ensure that this is prioritized by executives and enabled by media experts and technicians.

GARM was started by the World Federation of Advertisers and is supported by the CMO Growth Council of the Association of National Advertisers in the US.

[Why is the focus on digital and social platforms?](#)

App. 18

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The world is growing increasingly polarized, driven by inequities and disruption, and often that division is powered by harmful content.

While such content can be found in any media type, we focus on digital as this is the least regulated environment, with many governments still in the process of defining illegal content. In addition, advertiser transparency and placement controls in user-generated platforms that are open – those with no delay in publishing content – have been underdeveloped.

For advertisers who have invested heavily in these platforms, the danger of seeing their brands next to harmful content has become a major issue. No one wants to be inadvertently funding people intent on causing damage to society.

## What does success look like for GARM?

GARM is looking to create common cross-industry codes that improve industry transparency and control to effectively contain harmful content and remove advertising from any content that damages brands.

Success will be a continual reduction in harmful content on all platforms, underpinned by widely adopted standards, harmonized reporting, independent oversight and common tools.

## Who can join GARM?

Any advertiser, media agency, and media platform can join GARM provided they are willing to align with our [charter](#), which calls for uncommon collaboration in confronting this challenge. Member organizations also agree to adopt GARM solutions to improve business operations. Membership currently includes more than 60 of the world's biggest advertisers, all six major agency holding companies, seven industry groups, and 10 media platforms.

## How does work get done in GARM?

GARM work is developed by members and is based around Working Groups. Each group is formed to address a specific challenge highlighted by the GARM Charter. The Working Groups take these challenges in the form of a brief and work towards solutions, articulating needs and setting milestones for development. The process is managed by the WFA.

## How are decisions made?

GARM has a unique governance model; we have a Steering Team that brings together all the founding organizations – P&G, Unilever, Mars, Diageo, GroupM, 4As, ISBA, ANA, and, of course, the WFA. The Steering Team is responsible for setting priorities for the GARM, addressing impasses and approving solutions. It reports into the WFA Executive Committee.

Solutions developed by the Working Groups are proposed to the Community and are adopted based on Steering Team and Community endorsement.

## What commitment do you need to join GARM?

Our base request is:

1. Firstly, they need to attend monthly community calls (90min events focused on best practice sharing, thought leadership and solutions proposal), and;
2. Secondly, agreement to adopt and implement solutions both internally and where working with partners.
3. Finally, organizations can participate in working groups that meet fortnightly for 70min.

## How do you pick a working group/get assigned to it? Do the working group's focus on different topics?

GARM welcomes volunteers for all Working groups, however, we try to cap them at 10 persons maximum to allow for streamlined participation. Getting involved in a Working Group is as straightforward as sending an email to Rob Rakowitz and asking to join a group. Choosing a group should be based on personal and company interest as well as having the time to make a contribution.

GARM currently has the following Working Groups:

1. **Advancing Shared Language & Definitions:** with a focus on developing a common industry-wide way to agree on harmful content and risk tiers to allow for adequate control within the advertising industry.
2. **Measurement & Oversight:** with a focus on creating a standardized way to report data pertinent to industry health and individual platform progress on safety issues, specifically for marketing stakeholders
3. **Adjacency Standards & Controls:** with a focus on building a shared definition for measuring and managing how advertising placement is managed in digital media around sensitive content types
4. **Educating Operators & Stakeholders:** with a focus on improving the expertise of industry participants whether they are experts or generalists via training tools and events.

## Are there additional ways to get involved in GARM?

GARM runs focus groups on topics related to specific areas of brand safety e.g. kids, or healthcare, which all members can get involved with. We also work with selected media and technology companies to look at product concepts. Additionally, GARM occasionally holds industry events and panels. We offer opportunities to get involved to the Community as they are developed.

## What is GARM looking to achieve?

In an initial phase, GARM's goals are:

1. Alignment on definitions for harmful content and their adoption across the industry (achieved in Q4 2020);
2. Agreement to new measurement and reporting standards with third-party oversight (Q1 2021); and
3. Development of new tools that make content detection, classification, and media planning and buying more protected from harmful content (Q3 2021).

## What are the financial requirements for members?

We ask that members contribute to our annual expenses, which include staffing, research, events and travel. For more information about the membership fees please reach out to [GARM@wfanet.org](mailto:GARM@wfanet.org).

## How can we join GARM?

Joining GARM is as easy as completing a membership application and ensuring that executive leadership at your organization endorses participation.

## Why should you join GARM?

Harmful content online is a significant risk to society and the media industry. We must harness the commitment and the talent of the industry to face this challenge and create a safer, more civil media landscape.

- For more information or questions, please contact The GARM team at [GARM@wfanet.org](mailto:GARM@wfanet.org)

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